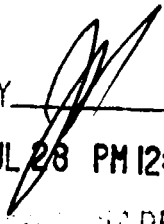


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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6001-CIV-GOLD

LYMUS L. BROWN, III

Plaintiff,

v.

DEPUTY D. LISANTI

Defendant.

**DEFENDANT'S MOTION FOR EXTENSION OF PRETRIAL DEADLINES**

Defendant, DEPUTY D. LISANTI, through undersigned counsel, and pursuant to Rule 7.1(A)(1), Local Rules of the United States District Court for the Southern District of Florida, files this Motion for Extension of Pretrial Deadlines, and in support states:

1. This is a 42 U.S.C. §1983 action brought by Plaintiff *pro se* Lymus Brown.
2. On May 26, 2000, the Court entered an Order Scheduling Pretrial Proceeding When Plaintiff is Proceeding Pro Se setting, among other pretrial deadlines, a discovery cutoff of July 31, 2000, and a summary judgment deadline of August 29, 2000.
3. The Plaintiff is currently housed at Liberty Correctional Institution in Bristol, Florida, and undersigned counsel has not had an opportunity to complete discovery on the Plaintiff, let alone depose him in jail, nor can he logistically do so by the current discovery cutoff of July 31, 2000.
4. Moreover, the records counsel has received and reviewed to date suggest that Mr. Brown never came into contact with Deputy Lisanti and, therefore, counsel will need additional time to obtain further discovery in order to properly prepare a summary judgment motion on behalf of this Defendant.
5. Because Mr. Brown is incarcerated, undersigned counsel is unable to confer with him pursuant to Rule 7.1(A)(3) in a good faith effort to determine whether he would have any objections

to the requested extensions. However, the extension would afford both sides additional time to conduct discovery and properly prepare this case for trial and, therefore, Plaintiff would not be prejudiced by the Court's granting of this motion.

WHEREFORE, Defendant, DEPUTE D. LISANTI, respectfully requests this Court grant his Motion for Extension of the Pretrial Deadlines set pursuant to this Court's Scheduling Order dated May 26, 2000.

WE HEREBY CERTIFY that a true and correct copy of the above and foregoing was furnished by U.S. Mail to Lymus Brown III DC #L24237 Liberty Correctional Institution, HCR 2, P.O. Box 144 Bristol, FL 32321 this 26<sup>th</sup> day of July, 2000.

Respectfully submitted,

BUNNELL, WOULFE, KIRSCHBAUM,  
KELLER, COHEN & McINTYRE, P.A.

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By: 

GREGG A. TOOMEY

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